

U.S. Department of Education

Staff Analysis of the Report Submitted by the Slovak Republic

Prepared October 2012

Background

In September 2007, the National Committee on Foreign Medical Education and Accreditation (NCFMEA) first determined that the Slovak Republic's standards and processes to evaluate medical education programs leading to the M.D. (or equivalent) degree are comparable to the standards of accreditation used to evaluate medical education programs in the United States. Additionally, the NCFMEA requested that the Slovak Republic submit a report on its accrediting activities for review by the NCFMEA in September 2009.

This analysis provides a review of the Slovak Republic's report of its accreditation activities and includes the following areas:

- Current status of medical schools
- Overview of accreditation activities
- Laws and Regulations
- Standards
- Processes and procedures
- Schedule of upcoming accreditation activities

Summary of Findings

Comprehensive responses have been provided for all areas of the report

Staff Analysis

Current status of medical schools

Country Narrative

1. Comenius University in Bratislava, the Faculty of Medicine (FMED CU). The most recent accreditation was performed on May 31, 2004. The university was fully accredited. On April 30, 2008 Comenius University submitted to Accreditation Commission (AC) an application for complex accreditation of the University, including also accreditation of FMED CU. On September 17, 2009 AC

approved the status of full accreditation for Comenius University, including FMED CU (for study programs of General Medicine and Dentistry). After decision of AC from December 7-8, 2011, the process of the next complex accreditation will start on March 1, 2014.

2. Comenius University in Bratislava, the Jessenius Faculty of Medicine in Martin (JFMED CU). The most recent accreditation was performed on May 31, 2004. The university was fully accredited. On April 30, 2008 Comenius University submitted to AC an application for complex accreditation of the University, including also accreditation of JFMED CU. On September 17, 2009 AC approved the status of full accreditation for Comenius University, including JFMED CU (for study program of General Medicine). JFMED CU applied for accreditation of the study program of Dentistry in 2011. The Work Team for Medical and Pharmaceutical Sciences (WTMPS) carried out the whole process of accreditation of the study program including the onsite visit in Martin; WTMPS submitted a positive proposal for accreditation of the program to the Accreditation Commission. The proposal was approved by AC. On November 29, 2011 the Minister of Education, in accordance with Section 102 Letter e of the Act 131/2002 of the Law Code, decided on recognition of the right of JFMED CU to award graduates after successful completion of the study program of Dentistry the academic degree Doctor of Dentistry (abbr. MDDr.). After decision of AC from December 7-8, 2011, the process of the next complex accreditation will start on March 1, 2014.

3. Safarik University in Kosice, the Faculty of Medicine (FMED SU). The most recent accreditation was performed on December 6, 2004. It was fully accredited. On September 29, 2008 Safarik University submitted to AC an application for complex accreditation, including also accreditation of FMED SU. On November 3, 2009 AC approved the status of full accreditation for FMED SU (for study programs of General Medicine and Dentistry). After decision of AC from December 7-8, 2011, the next complex accreditation will start on June 1, 2014.

4. Slovak Medical University in Bratislava, the Faculty of Medicine (FMED SMU) (also the Faculty of Medical Specialization Studies - FMSS). FMSS applied for accreditation of the study program of General Medicine on June 9, 2006. The program was provisionally accredited. On January 2009 SMU submitted to AC an application for complex accreditation of the University, which includes also accreditation of General medicine program carried out at SMU FMSS. On February 9, 2010 AC approved the status of full accreditation for FMED SMU for study program General Medicine. After decision of AC from December 7-8, 2011, the process of the next complex accreditation will start on March 1, 2015.

Analyst Remarks to Narrative

The Slovak Republic lists the following four medical schools as currently operating within their country: Comenius University in Bratislava, Faculty of Medicine; Comenius University in Bratislava, Jessenius Faculty of Medicine in Martin; Safarik University in Kosice; and the Slovak Medical University in Bratislava. Each of the country's medical schools has received full accreditation. It should be noted that the country's narrative discusses initial accreditation of each study program (medical school) and subsequent complex accreditation reviews of the university including the medical program. The dates of the initial accreditation of each school (or study program), and the most recent and upcoming comprehensive evaluations of each university, are included in the country's narrative.

In addition, the Accreditation Commission highlights its use of work teams. As noted in the narrative, the work team for medical and pharmaceutical sciences conducted the accreditation process including the onsite review of the study program of dentistry for Comenius University. The work teams' recommendation is forwarded to the Accreditation Commission which makes the final accreditation decision. The Country's policy for the use of work teams is found in the Higher Education Act 363/ 2007 of the Law Code (exhibit 2).

Overview of accreditation activities

Country Narrative

The Accreditation Commission, (see Exhibits No 1, 2, 3, 4) was appointed along with the Higher Education Act 131/2002, Section 81 ,by the Government of the Slovak Republic on the proposal of the Minister of Education and after an opinion given by the representative bodies of higher education institutions on September 1, 2008.

Since September 2009 AC is composed of the following 21 members.

Chair: Prof. Ing.Lubor Fišera, PhD, DSc.

Vice-Chair: Prof. Ing. Ján Michalík, PhD

Members:Prof. JUDr. Jozef Bena, PhD.,Prof. Ing. Stanislav Biskupic, PhD., D.Sc., Prof. RNDr. Lev Bukovský, PhD., D.Sc.,Prof. Milan Corba,Prof. Dr. MA Ing. Július Horváth, PhD.,Prof. Ing. Ivan Hyben, PhD.,Prof. PaedDr. Ludmila Jancoková, PhD.,Mons. Prof. ThDr. Jozef Jarab, PhD.,Prof. Ing. Miroslav Líška, PhD.,Prof. Ing. Jozef Mihok, PhD.,Prof. RNDr. Peter Mikulecký, PhD.,Prof. MVDr. Michal Novák, PhD., D.Sc.,Prof. Ing. Jaroslav Škvarenina, PhD.,Prof. Juraj Šteno, M.D., PhD.,Ing. Jozef Uhrík, PhD.,Prof. Ing. Jozef Vilcek, PhD.,Prof. Ing. Pavol Vincúr, PhD.,Prof. JUDr. Peter Vojcík, PhD.,Prof. PhDr. Tibor Žilka, PhD., D.Sc.

Secretary: RNDr. Mária Holická

The Chair and other members of the Work Team for Medical and Pharmaceutical Sciences (WTMPS) were appointed by the Chair of the AC after the approval by AC. Since December 2011 WTMPS has the following members:

Chair: Prof. Juraj Šteno, M.D., PhD. (member of AC)

Members: Mons. Prof. ThDr. Jozef Jarab, PhD. (member of AC), Prof. MVDr. Michal Novák, PhD., D.Sc. (member of AC), JUDr. Helena Csémyová, PhD. Lubica Dernárová, PhD., Prof. Andrej Dukát, M.D., PhD., Prof. RNDr. Viliam Foltán, PhD., Richard Imrich, M.D., PhD., Fedor Jagla, M.D., PhD., Prof. Ján Jakuš, MD, PhD., D.Sc., Prof. Vladimír Javorka, M.D., PhD., Štefánia Móricová, M.D., PhD., Prof. Jozef Rovenský, M.D., PhD., D.Sc., Prof. Igor Šulla, M.D., PhD., D.Sc., Doc. PhDr. Gabriela Vörösová, PhD., Doc. Ján Staško, M.D., PhD., PhDr. Mária Zamboriová, Doc. Pavol Žúbor, M.D., PhD.

Since September 2009 the meetings of the Accreditation Commission were held as follows:

October 21-23, 2009 - in Nový Smokovec

December 3-4, 2009 - in Bratislava

February 3-4, 2010 - in Tatranské Zruby

April 28-30, 2010 - in Donovaly

June 8, 2010 - in Bratislava

June 28-July 1, 2010 - in Spišská Kapitula

September 20, 2010 - in Bratislava

October 20-22, 2010 - in Nový Smokovec

December 1-2, 2010 - in Bratislava

February 23-25, 2011 - in Žilina

April 27-29, 2011 - in Nitra

June 22-24, 2011 - in Spišská Kapitula

August 23, 2011 - in Bratislava

October 26-27, 2011 - in Tatranské Zruby

December 7-8, 2011 - in Bratislava

During the period September 2009-December 2011 the Accreditation Commission discussed, solved and decided a great number of applications and requests being addressed to it, such as applications for accreditation of study programs or applications for change of guarantors of particular study programs, also the accreditation of the habilitation procedure and procedure for nomination of professors. The accreditations of four Universities including their Faculties of Medicine by AC had been fully finished by September 17, 2009 (FMED CU, JFMED CU), respectively by November 3, 2009 (FMED ŠU), and by February 2010 (FMED SMU). The particular members of WTMPs were appointed to carry out on-site reviews at each Faculty of Medicine, yet before September 2009 (see previous Report on September 2009, sent to NCFMEA). All members of the "partial Work Teams" were appointed in accordance with the Rules to prevent conflict of interests.

During the evaluated period September 2009 - December 2011 two on-site reviews at particular Faculties of Medicine in Slovakia were performed (JFMED CU - Dentistry, FMED SMU - Dentistry).

Generally, the on-site reviews at all Faculties of Medicine followed the same procedures as follows:

- personal interviews with appointed dignitaries of the Faculties

of Medicine and guarantors of study programs,

- on-site visits of teaching and research premises and their equipment, including libraries and information centers,
- on-site visits of teaching hospitals and clinical clerkship sites,
- meetings and interviews with students and PhD. students of the Faculties (closed for the teaching staff),
- verification of outcomes/findings,
- meetings of “partial work teams” with the aim to summarize the outcomes/findings.

In accordance with the Higher Education Act 131/2002, Section 84,(see Exhibit 2) the final results of the complex accreditation consist of the following:

- evaluation and fulfillment of the mission of each Faculty of Medicine and its tasks based on analysis of their activities developed by the Accreditation Commission; the evaluation will also contain recommendations for improvement of work of each Faculty of Medicine,
- opinion of the Accreditation Commission on the capacity of each Faculty of Medicine to implement study program for accreditation of which the Faculty of Medicine of particular University has applied and a decision of the Ministry of Education on granting, suspension, deprivation or not granting the relevant rights,
- opinion of the Accreditation Commission on capacity to conduct habilitation procedure and procedure for nomination of professors in the fields of study for accreditation of which particular University has applied and a decision of the Ministry of Education on granting, suspension, deprivation or not granting the relevant rights,
- evaluation of research, development and other activities of the Faculty of Medicine of particular University,
- statement of the Accreditation Commission on classification of the higher education institution according to Section 2, Clause 13 of the Higher Education Act 131/2002.

The Ministry of Education will decide on granting, suspension, deprivation or not granting the rights within sixty days from receipt of the statement from AC. The Ministry of Education will provide to the Universities the evaluation reports of the Accreditation Commission and results of its decision concerning granting the rights.

Analyst Remarks to Narrative

The Accreditation Commission established by the government of Slovak Republic accredits universities every six years according to its previously published plan of comprehensive accreditations. The Commission has 21 members appointed by the Government of the Slovak Republic for a period of six years. The country has provided a list of its current Commissioners which have served on the Accreditation Commission since 2009. In addition, the Accreditation Commission has met 15 times between October 2009 and December 2011.

September 2009 thru December 2011 the Accreditation Commission accredited the following universities with medical education programs:

-September, 2009

Comenius University in Bratislava, Faculty of Medicine

Comenius University in Bratislava, Jessenius Faculty of Medicine

-November , 2009

Safarik University, Faculty of Medicine

-February 2010

Slovak Medical University, Faculty of Medicine

The Accreditation Commission conducted the following onsite reviews:

-December 2011

Comenius University Jessenius Faculty of Medicine (Dentistry)

-December 2011

Slovak Medical University, Faculty of Medicine (Dentistry)

The narrative includes information about what an onsite review of a faculty of medicine consists of. The list includes on-site visits of teaching hospitals and clinical clerkship sites.

There is no information provided in the narrative regarding accreditation conferences or training sessions held.

Staff Determination: Additional information is requested for this section regarding accreditation conferences or training sessions held.

Country Response

The Work Team for Medical and Pharmaceutical Sciences (WTMPS) of the Accreditation Commission is composed of distinguished and experienced professors in the basic and clinical sciences from all Slovak faculties of medicine and the Slovak Academy of Sciences. There are no special accreditation conferences or training sessions since the WTMPS members who are responsible for accreditation of only 4 faculties of medicine in the country can discuss and decide on all issues and processes concerning accreditation directly at their meetings. Moreover, during these meetings the Chair of the Work Team and the Secretary of the Accreditation Commission regularly inform all members on new legislative changes and regulations concerning medical education. At the same time, the members of WTMPS discuss application of these changes into practical activities of the Work Team in the process of accreditation.

Members of Partial Work Team (evaluators) chosen from among the members of WTMPS and appointed to carry out particular on-site visit do their review in accordance with the valid Criteria for Accreditation of Higher Education Study Program. After the on-site visit the evaluators submit their report to the WTMPS for detailed discussion and determination. Final decision of the WTMPS is

submitted to the Accreditation Commission for approval.

Analyst Remarks to Response

In the draft report, Department Staff requested additional information in this section regarding accreditation conferences or training sessions held. In its response, the agency informs Department staff that there are no special accreditation conferences or training sessions. Members of the Work Team for Medical and Pharmaceutical Sciences (WTMPS) of the Accreditation Council are comprised of distinguished and experienced professors from all Slovak faculties of medicine and the Slovak Academy of Sciences. The agency states that these individuals have the opportunity to meet and discuss accreditation issues at their meetings without having to attend special accreditation conferences. The agency also explains that during these meetings the Chair of the Work Team and the Secretary of the Accreditation Commission informs all members on new legislative changes and regulations concerning medical education.

The information provided by the agency explains its method of providing training for individuals involved in accreditation activities during regular meetings, and includes that there were 15 such meetings between Oct 2009 and Dec 2011.

Staff Conclusion: Comprehensive response provided

Laws and regulations

Country Narrative

Through the evaluated period September 2009-December 2011 the following laws and Regulations were kept as valid:

The Higher Education Act 363/2007 of the Law Code (see Exhibit 2). The changes and supplements affecting the accreditation of medical schools in Slovakia are incorporated in Part Nine of the Act. The most important change concerning medical programs is listed in Section 83, Clause 13 which requires that the Accreditation Commission will ask the Ministry of Health in the beginning of accreditation of the study program in the field of health service for its opinion if the graduates of the study program fulfill the conditions for pursuit of health profession according to a special act. In addition to Law 363/2007, the Higher Education Act has been changed and supplemented by other four laws (Law 129/2008, Law 144/2008, Law 282/2008, Law 462/2008). However, none of these minor laws affects medical studies nor accreditation of medical schools.

The changed and supplemented Regulation of the Government 104/2003 (enclosed as Exhibit 6). This Regulation specifies mainly:

- - detailed structure of request of an university for opinion of the Accreditation Commission on capacity of the university to implement particular study program and to award the graduates of the program the academic degree,
- detailed structure of request of a university for opinion of the Accreditation Commission on the right of the university to carry out the habilitation procedure

and a procedure for nomination of professors in required field of study
- structure of request of a university for complex accreditation by the Accreditation Commission

- procedures in execution of fields of activities of the Accreditation Commission in accreditation of particular activities of a university,
- procedures in execution of fields of activities of the Accreditation Commission in complex accreditation of activities of a university.

On March 12, 2008 the old Statute of the Accreditation Commission(AC)was quashed and the Government of the Slovak Republic approved a new Statute of the Accreditation Commission (see exhibit 4) in accordance with the Higher Education Act 131/2002, Section 81, Clause 12, and Section 102, Clause 1, Letter b. The Statute determines methods of the Commission's sittings and sittings of its work teams.

The Higher Education Act 131/2002 was changed and supplemented 9 times during the mentioned period. However, no substantial changes concern medical education.

Analyst Remarks to Narrative

The country reports the Higher Education Act 363/2007 remains valid; however, the country does discuss a change incorporated into section 83 which does affect medical schools. The new change requires the Accreditation Commission to attain the opinion of the Ministry of Health related to how graduates are performing in the medical industry. The details of the change can be found in clause 13 as noted in the narrative. The country reports that this change has not significantly affected the accreditation of medical schools or programs. The country also reports that additional amendments have been made to the Higher Education Act 363/2007; however, those changes did not affect medical studies or the accreditation of medical schools. In addition, the country reports that its Higher Education Act 131/2002 was changed and supplemented nine times during the mentioned period. However, there were no substantial changes concerning medical education.

Standards

Country Narrative

Through the period September 2009-December 2011 AC strictly followed The Criteria for Accreditation of Higher Education Study Programs endorsed by the Resolution of Minister of Education on March 31, 2003, the Higher Education Act 131/2002, and Standards and Guidelines for Quality Assurance in the European Higher Education Area.

In accordance with the Higher Education Law 131/2002 and the Regulation of the Government of the Slovak Republic 104/2003 on Accreditation Commission in the wording of later regulations a full-time university professor is allowed to act as a guarantor of a particular study program until he/she reaches the age of 65.

He/she is allowed to act as a guarantor of the study program at one university only. The guarantor of the study program must be a full-time professor in the field of study within which the study program is carried out. He/she is allowed to act as a guarantor of one study program in one field of study only.

Since September 2009- December 2011 there have not been any substantive changes in the curricula used by the medical schools in Slovakia.

The admission procedures have still been carried out anonymously as it was reported in our Initial Application in 2006. There have not been any substantive changes.

In the field of student services there have not been any changes since September 2009.

Since 2008 the three Faculties of Medicine in Slovakia (in Bratislava, Martin and Košice) have been regularly (in yearly intervals) preparing and administering tests to find out an actual situation in retention of knowledge among their students. The Tests of Retention Knowledge of Students of Medical Faculties are prepared by guarantors of each subject at all three Faculties of Medicine under the guarantee by the WTGPS. The Tests are taken by the students of the 3rd year of study from subjects of the 1st and 2nd years and by the students of the 6th year of study from subjects of the 3rd, 4th and 5th years of study. Such tests are repeated regularly every year and their results enable to compare the level of the students' retention knowledge between the Faculties as well as future tendencies. Detailed information and results of the Test performed each year since 2008, are enclosed (see Exhibit 5).

Nowadays, following an increase in number of newly admitted students (mainly to English program of General Medicine), a new complex consisting of a large campus auditorium, a conference room for the Scientific Council, the new faculty library and another university premises for the Dean's office, seminar rooms, and a new canteen have been completed at Comenius University, the Jessenius Faculty of Medicine in Martin. The new complex campus helps to maintain the standards for individual approach to students during practical sessions and increase the quality of the student services.

All four Faculties of Medicine are continuously renewing and supplementing their instrumentation needed for practical instruction of students, especially at basic science departments.

Analyst Remarks to Narrative

The Accreditation Commission reports that it continues to abide by the Criteria for Accreditation of Higher Education Study Programs endorsed by the Resolution of Minister of Education, the Higher Education Act 131/2002, and Standards and Guidelines for Quality Assurance in the European Higher Education Area.

During this evaluation period (September 2009- December 2011) the Commission notes that there have not been any substantive changes in the curricula used by the medical schools. There has not been any substantive change in admissions or student services standards during this evaluation period. However, a notable activity initiated in 2008 by the country's' medical

programs, involves annual testing of medical students. The medical schools have developed and have begun administering tests on a yearly basis for the purpose of determining medical students' retention of knowledge. The results are used to improve learning. The country reports that a new complex has been constructed at Comenius University, in Martin, mainly to accommodate an increase of students in its English Program of General Medicine. The new complex has a large campus auditorium, conference room for the Scientific Council, new library, and canteen.

Processes and procedures

Country Narrative

During the period Sept 2009-Dec. 2011 there have not been any substantive changes in processes and procedures. Along with the Higher Education Act 131/2002, Section 84, Clause 2, and the Regulation of the Government of the Slovak Republic 104/2003 on Accreditation Commission, Section 4, Clause 2, the site visits of medical schools by the representatives of the Accreditation Commission are conducted regularly in six-year intervals within complex accreditation of activities of the University. The site visits are carried out according to previously published schedule developed by the Accreditation Commission. The most recent site visits of all four Faculties were carried out in January, April and May 2009 (complex accreditation) and 2011 (Dentistry at JFMED CU Martin and FMED SMU Bratislava) as mentioned above.

Periodic re-evaluation of medical schools is carried out strictly in accordance with the Higher Education Act 131/2002, Section 84 (Complex Accreditation Activities of a Higher Education Institution) and the Regulation of the Government of the Slovak Republic 104/2003 on Accreditation Commission, Section 4, Clause 2.

Reviews of substantive changes reported by medical schools (opinion on capacity to conduct habilitation procedure and procedure for nomination of professors, approval of change of guarantors of study programs, or opinion on the capacity of a university to implement new study programs including PhD. programs) follow the Higher Education Act 131/2002, Section 83, and the Regulation of the Government of the Slovak Republic 104/2003 on Accreditation Commission, Section 3.

The Accreditation Commission has effective controls against conflicts of interests and the inconsistent application of accreditation standards as it was explained in our Response to the Draft Analysis of the Standards Used by the Slovak Republic for the Evaluation of Medical Schools in March 2007. The self-evaluation of the AC was prepared at the end of 2011 and issued in 2012 (see Exhibit 3). This document contains the most important information about the existing system of higher education in the Slovak Republic, and the system of quality assurance in higher education. Complex accreditation of activities of a higher education institution is still carried out at six-year intervals, in conformity with a previously published schedule on complex accreditation. The time schedule for submission of basic documents needed for complex accreditation should be known at least one year in advance. In the period between two

complex accreditations of the activities of a higher education institution the accreditation of individual activities of a higher education institution according to Section 83 of the Law on Higher Education may be performed if a need arises. Throughout the evaluated period there have not been any other changes in the Rules used to prevent conflicts of interest within the members of the Accreditation Commission and its work teams. The Rules are included in The Self-evaluation report of AC.

The evaluation of student performance after graduation from medical school is taken into consideration when accreditation decisions are made. It is included in the Criteria for Accreditation of Higher Education Study Programs as the Criterion CSP-B10. This Criterion deals with the standard of all graduates (from the best one to the weakest one) considering the standard requirements for the quality of educational process in the particular branch, the compliance of the level of knowledge, abilities and skills of the graduates with the profile of the graduate and expected future career of the graduates in accordance with the presuppositions. In practice, when evaluating the level of the students and graduates of the study program, the level of all the graduates (i.e. from the best one to the weakest one) is evaluated, considering the standard requirements for the quality of the educational process in the particular branch. According to the specifications of the study program, the University may prove how independently the graduate is able to solve the difficult tasks. When assessing the compliance of the level of knowledge, abilities and skills of the graduates with the profile of the graduate (Section 51, Clause 4, Letter e) of the Law) and expected future career of the graduates, it is assessed how the study program of the University and the way it is put into practice enables to acquire such profile of the graduate that was designed for this study program. When assessing the future career of the graduates in accordance with the presuppositions, the data about the career of the graduates collected by the University are used.

The yearly student evaluations of subjects (courses) and professors and other teachers by means of anonymous questionnaires have still been carried out at all Faculties. Their results provide significant feedback information for the Work Team of the Accreditation Commission on the quality of the educational process which is taken into account during the complex accreditation.

Analyst Remarks to Narrative

The Commission notes that there have been no substantive changes in its processes and procedure during this evaluation period from September 2009-December 2011. The Commission reports that site visits are conducted in accordance with previously published schedules and it continues to evaluate the performance of its students after graduation in accordance with the Criteria for Accreditation of Higher Education Study Programs. Yearly evaluations of courses and professors continue to be employed to provide feedback as part of the Commission's accreditation process.

Schedule of upcoming accreditation activities

Country Narrative

The list of the accreditation meetings, for the period covering September 2009 - December 2011 is given in the Overview of Accreditation Commission (AC) Activities.

The upcoming meetings of AC will be held as follows:

July 10, 2012 – in Bratislava

October 3 – 5, 2012 – in Tatranské Zruby

December 5 – 7, 2012 – in Bratislava

Analyst Remarks to Narrative

The Accreditation Commission lists the following upcoming Accreditation Commission meetings:

- July 10, 2012 - in Bratislava

- October 3 - 5, 2012 - in Tatranské Zruby

- December 5 - 7, 2012 - in Bratislava
